

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND EXPENSES  
TO GREG T. MURRAY, P.L.L.C., AS ACCOUNTANT TO DEBTOR  
FOR THE TIME PERIOD OF JANUARY 3, 2022 TO SEPTEMBER 30, 2022**

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**This Application seeks an order that may adversely affect you. If you oppose the Application, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the Application should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the Application and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the Application at the hearing.**

**Represented parties should act through their attorney.**

Name of Applicant:		Greg Murray, Greg T. Murray, P.L.L.C.
Applicant's professional role in case:		Accountant to Trustee
Indicate whether this is an interim or final application:		Interim
Date Order of Appointment signed		07/28/22 [ECF No. 132]
Effective Date of Appointment		01/03/22
	Beginning of Period	Ending of Period
Total period covered in Application	01/03/2022	09/30/2022

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<sup>1</sup> The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a **"Bankruptcy Estate"** and collectively, **"Bankruptcy Estates"**.

Time periods covered by any prior Applications	N/A	N/A
Total amounts awarded in all prior Applications:		\$0.00
Amount of retainer received in the case		\$0.00
Total fees and expenses applied for in this application (including any retainer amounts to be applied)		\$23,625.00
Total professional fees requested in this Application:		\$23,625.00
Average Hourly Rate for Professionals:		\$250.00
Total professional hours covered by this Application		110.25
Reimbursable expenses sought in this Application		\$0.00
Application Cost		\$950.00

TO THE HONORABLE DAVID R. JONES, UNITED STATES BANKRUPTCY JUDGE:

Greg T. Murray, P.L.L.C. (“**Murray**”), accountant for J. Patrick Lowe, Chapter 7 Trustee in the above-captioned case (the “**Trustee**”) hereby files this *First Interim Application for Allowance of Fees and Expenses for to Greg T. Murray, P.L.L.C., as Accountant to Debtor for the Time Period of January 3, 2022 through September 30, 2022* (“**First Interim Application**”), for allowance of compensation of \$23,625.00 for the time period from January 3, 2022 to September 30, 2022. A copy of the proposed order is attached as Exhibit A. In support of this First Interim Application, Murray respectfully asks the Court to approve and authorize this First Interim Application based on the following:

### **I. Jurisdiction, Venue and Background**

1. This Court has jurisdiction over this First Interim Application pursuant to 28 U.S.C. § 1334. Venue for this case is proper in the Southern District of Texas under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief requested herein are Sections 327 and 330 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014 of the Local Rules of Bankruptcy Procedure for the Western District of Texas.

3. On December 9, 2021, (the “**Petition Date**”), the Debtors filed voluntary petitions under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”) [ECF No. 1]. The Court, by its Order entered December 21, 2021, authorized that the Debtors’ bankruptcy cases be jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523 (the “**Jointly Administered Case**”) [ECF No. 20].

4. On or about December 21, 2021, John Patrick Lowe was duly appointed as Trustee.

5. On June 7, 2022, Trustee filed *Trustee’s Nunc Pro Tunc Application to Employ Greg T. Murray, P.L.L.C. as Accountant* (the “**Employment Application**”) [ECF No. 123], seeking to employ Murray as an accountant effective as of January 3, 2022. Murray received no retainer in this case. As set forth in the Employment Application, Murray was employed on an hourly fee basis plus costs for actual, necessary expenses incurred by Murray. *See* Employment App. at ¶ 11.

6. On July 28, 2022, the Court entered the Order on the Employment Application [ECF No. 132] (the “**Employment Order**”), wherein the Court authorized the Trustee to employ Murray as an accountant effective as of January 3, 2022. A copy of the Employment Order is attached hereto as Exhibit B.

## **II. Application for Hourly Services**

7. Murray has provided accounting services and expended 110.25 hours from January 3, 2022, to September 30, 2022, totaling \$23,625.00 in fees representing the Trustee. Attached hereto as Exhibit C is a copy of a billing statement from Greg T. Murray, PLLC itemizing the fees by date incurred by Murray in connection with accounting services for the Trustee. In general,

Murray: (1) performed a forensic analysis of Debtors' Quickbook files and financial records, (2) conducted an insolvency analysis, (3) updated Debtors' financial and accounting records, (4) assisted the Trustee in identifying missing transaction information to subpoena from respective financial institutions, (5) assisted the Trustee in identifying payments to investors, (6) assisted the Trustee in identifying payments to finders and professionals, (7) verified and entered all of the Debtor's transactions in Quickbooks software to facilitate conducting the foregoing tasks, and (8) issued a report based on his forensic analysis of Debtors' records.

8. This is the first interim application for fees and expenses filed by Murray.

9. Murray submits that this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

### **III. Authorities and Argument**

10. The statutory predicates for the relief sought by this First Interim Application are sections 328(a) and 331 of the Bankruptcy Code.

11. Bankruptcy Code section 330(a) provides that in determining the amount of reasonable compensation to be awarded, a Court shall consider the nature, the extent, and the value of the services rendered by the professional, while taking into account the relevant factors, including the following:

- The time spent on such services;
- The rates charged for such services;
- Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered, toward the completion of the bankruptcy case;
- Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issues or task addressed;

- With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than bankruptcy cases.

11 U.S.C. § 330(a)(3). *See also Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir. 1994) (noting Bankruptcy Code’s policy of providing adequate compensation and stating that “Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.”) (citation and internal quotation marks omitted); *see also In re Woerner*, 783 F.3d 266, 274 (5th Cir. 2015) (“[Section 330] permits a court to compensate an attorney not only for activities that were ‘necessary,’ but also for good gambles—that is, services that were objectively reasonable at the time they were made—even when those gambles do not produce an ‘identifiable, tangible, and material benefit.’”) (citations and internal quotation marks omitted); *see also In re Pilgrim’s Pride Corp.*, 690 F.3d 650 (5th Cir. 2012) (reaffirming that bankruptcy courts have discretion to enhance professional fees in extraordinary cases).

12. The fees incurred by Murray in providing accounting services to Debtor were reasonable and necessary for the administration of the Case. Murray performed these services within a reasonable period of time and has significant experience in providing accounting services within bankruptcy cases. Additionally, the rates charged by Murray in this matter are comparable to the rates charged by Murray in non-bankruptcy matters. Therefore, Murray has met the requirements of section 330(a) of the Bankruptcy Code, and the Court should award the fees and expenses sought in this First Interim Application.

13. Murray submits that this First Interim Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

**WHEREFORE**, Murray prays that upon consideration hereof, this Court enter an Order approving Murray's request for interim fees in the amount of \$23,625.00 and granting such other and further relief as the Court finds appropriate to grant.

Respectfully submitted,

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
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San Antonio, Texas 78213  
[www.pulmanlaw.com](http://www.pulmanlaw.com)  
(210) 222-9494 Telephone  
(210) 892-1610 Facsimile

By: /s/ Randall A. Pulman  
Randall A. Pulman  
Texas State Bar No. 1639250

**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of November 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice. A copy of the notice/summary of the Second Fee Application will be mailed via US First Class Mail to the parties on the limited service list in this case, and a supplemental certificate of service will be filed to evidence compliance.

**Via Counsel CM/ECF:**

[catherine.curtis@wickphillips.com](mailto:catherine.curtis@wickphillips.com)  
[jason.rudd@wickphillips.com](mailto:jason.rudd@wickphillips.com)

Policy Services, Inc.  
deeproot Pinball, LLC  
deeproot Growth Runs Deep Fund, LLC  
deeproot 575 Fund, LLC  
deeproot 3 Year Bonus Income Fund, LLC  
deeproot BonusGrowth 5 Year Debenture Fund, LLC  
deeproot Tech, LLC  
deeproot Funds, LLC  
deeproot Studios, LLC  
deeproot Capital Management, LLC  
12621 Silicon Dr.  
San Antonio, TX 78249

**Via Counsel Via CM/ECF:**

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**Via CM/ECF: [pat.lowe.law@gmail.com](mailto:pat.lowe.law@gmail.com)**

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**Via CM/ECF:**

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United States Trustee - SA12  
US TRUSTEE'S OFFICE (Aubrey Thomas)  
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San Antonio, TX 78295-1539

**Via CM/ECF: [don.stecker@lgbs.com](mailto:don.stecker@lgbs.com)**

Don Stecker  
Linebarger Goggan et al.  
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**Via CM/ECF: [rbattagliaw@outlook.com](mailto:rbattagliaw@outlook.com)**

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66 Granburg Circle  
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**Via CM/ECF: [jpetree@mcslaw.com](mailto:jpetree@mcslaw.com)**

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SHANNON, MARTIN et al.  
1001 McKinney Street #1100  
Houston, TX 77002

**Via CM/ECF: [bk-murphy@oag.texas.gov](mailto:bk-murphy@oag.texas.gov)**

Texas Workforce Commission  
c/o Christopher S. Murphy  
TEXAS ATTORNEY GENERAL'S OFFICE  
PO Box 12548  
Austin, TX 78711

**Via CM/ECF: [pautry@branscomblaw.com](mailto:pautry@branscomblaw.com)**

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4630 N. Loop 1604 West, Suite 206  
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**Via CM/ECF: [lmjurek@jureklaw.com](mailto:lmjurek@jureklaw.com)**

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Craig Hale  
HALE | WOOD PLLC  
4766 Holladay Blvd.  
Holladay, Utah 84117

**Via CM/ECF:**

**[stephen.humeniuk@lockelord.com](mailto:stephen.humeniuk@lockelord.com)**

Stephen J. Humeniuk  
LOCKE LORD LLP  
600 Congress Avenue, Suite 2200  
Austin, TX 78701

**Via CM/ECF:**

**[tcunningham@lockelord.com](mailto:tcunningham@lockelord.com)**

Thomas J. Cunningham  
LOCKE LORD LLP  
777 S. Flalger Dr., Suite 215  
West Palm Beach, FL

/s/ Randall A. Pulman

Randall A. Pulman



# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

---

**ORDER GRANTING FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND EXPENSES  
FOR GREG T. MURRAY, AS ACCOUNTANT TO TRUSTEE  
FOR THE TIME PERIOD OF JANUARY 3, 2022 TO SEPTEMBER 30, 2022**

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Came on for consideration the *First Interim Application for Allowance of Fees and Expenses to Greg T. Murray, P.L.L.C., as Accountant to Trustee for the Time Period of January*

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<sup>1</sup> The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**".

3, 2022 to September 30, 2022 (“**First Interim Application**”). The Court has considered the First Interim Application and finds that the fees and expenses represent reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the First Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the First Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the First Interim Application have been resolved by this Order or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein.

**IT IS THEREFORE ORDERED** that the First Interim Application pursuant to 11 U.S.C. §331 is hereby **GRANTED**;

**IT IS FURTHER ORDERED** that the fees in connection with the hourly services described in the First Interim Application are allowed. All interim fees in the amount of \$23,625.00 shall be an administrative expense of the bankruptcy estate.

**IT IS FURTHER ORDERED** the Trustee is authorized to immediately pay the amount of \$23,625.00 approved in this Order on the First Interim Application.

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

**Submitted by:**

Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)  
Pulman, Cappuccio & Pullen, LLP  
2161 NW Military Hwy., Suite 400  
San Antonio, TX 78213  
Telephone: (210) 222-9494  
Facsimile: (210) 892-1610  
**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE**

# **EXHIBIT B**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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NOTICE OF FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND EXPENSES  
TO GREG T. MURRAY, P.L.L.C., AS ACCOUNTANT TO TRUSTEE  
FOR THE TIME PERIOD OF JANUARY 3, 2022 TO SEPTEMBER 30, 2022

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**This Application seeks an order that may adversely affect you. If you oppose the Application, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the Application should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the Application and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the Application at the hearing.**

**Represented parties should act through their attorney.**

YOU ARE HEREBY NOTIFIED, that on November 1, 2022, Trustee filed the *First Interim Application for Allowance of Fees and Expenses for to Greg T. Murray, P.L.L.C., as Accountant to Trustee for the Time Period of January 3, 2022 to September 30, 2022* (“**First Interim Application**”). This First Interim Application has been filed pursuant to 11 U.S.C. § 331, and covers professional services rendered to Debtor and reimbursement of expenses for the period

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<sup>1</sup> The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

January 3, 2022 to September 30, 2022. A summary of the fees and expenses sought by the Applicant is as follows:

Name of Applicant:		Greg Murray, Greg T. Murray, P.L.L.C.
Applicant's professional role in case:		Accountant to Trustee
Indicate whether this is an interim or final application:		Interim
Date Order of Appointment signed		07/28/22 [ECF No. 132]
Effective Date of Appointment		01/03/22
	Beginning of Period	Ending of Period
Total period covered in Application	01/03/2022	09/30/2022
Time periods covered by any prior Applications	N/A	N/A
Total amounts awarded in all prior Applications:		\$0.00
Amount of retainer received in the case		\$0.00
Total fees and expenses applied for in this application (including any retainer amounts to be applied)		\$23,625.00
Total professional fees requested in this Application:		\$23,625.00
Average Hourly Rate for Professionals:		\$250.00
Total professional hours covered by this Application		110.25
Reimbursable expenses sought in this Application		\$0.00
Application Cost		\$950.00

The foregoing is only a summary of the First Interim Application, a copy of such First Interim Application will be provided to any party upon written request to Randall A. Pulman, Pulman, Cappuccio & Pullen, LLP, 2161 NW Military Hwy., Suite 400, San Antonio, TX 78213.

Respectfully submitted,

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
2161 NW Military Highway, Suite 400  
San Antonio, Texas 78213  
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By: /s/ Randall A. Pulman  
Randall A. Pulman  
Texas State Bar No. 1639250

**ATTORNEYS FOR CATHERINE S. CURTIS,  
CHAPTER 7 TRUSTEE**

# **EXHIBIT C**



Deeproot Chapter 7  
Pat Lowe Trustee  
Pulman Cappuccio, & Pullen  
2161 NW Military Hwy Suite 400  
San Antonio, TX 78213

October 19, 2022  
Invoice # 12802

		<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2022	Receive e-mail from Randy Pulman with links to Deeproot Quickbooks files. Access all files in cloud storage. Copy files and load unto my server. Determined that files were created in Quickbooks 2015. Loaded QB 2015 software from old software archives. Successfully accessed all 16 files with Quickbooks 2015	2.00 250.00/hr	500.00
	Print out balance sheet and income statements for 16 Deeproot entities. Create PDF reports and e-mail to Randy Pulman and Pat Lowe	2.75 250.00/hr	687.50
3/14/2022	Download and review Policy Services information to Excel. Review for life insurance information and e-mail to Randy	1.25 250.00/hr	312.50
3/16/2022	Discuss forensic accounting requirements with Randy	0.25 250.00/hr	62.50
3/21/2022	Download all Quickbooks files to a flash drive. Deliver flash drive to Randy for transmittal to SEC. Discuss with Randy.	0.75 250.00/hr	187.50
6/17/2022	Download all balance sheet reports to Excel for each company. Start on insolvency analysis	2.00 250.00/hr	500.00
6/20/2022	Work on insolvency analysis	4.75 250.00/hr	1,187.50

Deeproot Chapter 7

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2022	Complete balance sheet and insolvency consolidated spreadsheets for 2015 to 2020. E-mail to Randy	5.00 250.00/hr	1,250.00
6/22/2022	Review all bank account statements in dropbox. Set up Becky Harker to access account statements and key transactions in existing QuickBooks files until accounts are closed by Pat Lowe. Attend Zoom meeting to discuss information required to start Chapter 5 claims	2.75 250.00/hr	687.50
6/26/2022	Download and create 2021 only bank statement details. Review accounts for disbursements requiring legal action to identify payee	1.50 250.00/hr	375.00
6/27/2022	Identify transactions requiring securing images from Wells Fargo Bank. Review all payments in Deeproot Tech and Deeproot Studio that may be recovered and create Excel spreadsheet	3.00 250.00/hr	750.00
6/30/2022	Becky Harker services to enter all 2021 bank transactions and reconcile accounts for 11 Deeproot companies	22.50 75.00/hr	1,687.50
7/5/2022	Receive Fed Ex with SEC credit card documents on flash drive. Loan on server and review statements. Send e-mail to Becky Harker with instructions on tracking payments by company	0.75 250.00/hr	187.50
7/7/2022	Update Policy Services information for check stubs Create new request to PCP for documents from Wells Fargo	3.25 250.00/hr	812.50
7/11/2022	Record all 2021 Deeproot Funds disbursements that were for DR Tech to intercompany account. Record the transactions in DR Tech and reconcile intercompany account. Reconcile Policy Services and Deeproot Funds intercompany accounts. Set up account to track 2021 funds from investors	4.00 250.00/hr	1,000.00
7/13/2022	Revise Deeproot subpoena request and e-mail to Randy	1.00 250.00/hr	250.00
7/14/2022	Discuss Deeproot requested document issue with Mary Ann. Receive e-mail with Ben Wolfe research and wire transfer information. Review document and reply to Randy Pulman	0.50 250.00/hr	125.00

Deeproot Chapter 7

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
7/16/2022	Record wire transfer information in Deeproot Funds. Record Deeproot Tech transactions in Tech Quickbooks file	1.00 250.00/hr	250.00
7/18/2022	Prepare schedule of investor payments in Deeproot Funds	2.00 250.00/hr	500.00
7/21/2022	Complete Excel spreadsheet download from Deeproot Funds Quickbooks for investor and professionals payments	1.75 250.00/hr	437.50
7/24/2022	Complete Deeproot Tech professional payments schedule. Complete much of 2021 consolidated balance sheet Excel Spreadsheet	6.75 250.00/hr	1,687.50
7/25/2022	Complete all payments to investors and professionals spreadsheets. Complete consolidated balance sheet back to 2012. E-mail all work to Randy Pulman and staff	3.25 250.00/hr	812.50
7/28/2022	Telephone conference with Randy and Drew to discuss my spreadsheets. Attend Webex call with SEC counsel	2.75 250.00/hr	687.50
8/1/2022	Record Deeproot monthly interest distributions using SEC supplied information	4.00 250.00/hr	1,000.00
8/2/2022	Complete entering all unknown transactions using SEC data. Complete revised document production request. E-mail to Randy and Drew	3.00 250.00/hr	750.00
8/11/2022	Receive additional information from Anna MacFarlane. Record transactions and send e-mail on open items. Attend Zoom call with Randy and Anna. Investigate Dora Mower transactions after receiving documents from Benjamin Wulfe. Send analysis to Randy and Anna	3.25 250.00/hr	812.50
8/16/2022	Scan final document request pages to Drew for attaching to Wells Fargo Subpeona	0.25 250.00/hr	62.50
8/23/2022	Receive and reply to David Nasse e-mail concerning access problems with certain Quickbooks Files. Prepare and send excel general ledger reports for the files that they could not upgrade from QB 2015.	1.00 250.00/hr	250.00
8/25/2022	Prepare and send Excel spreadsheet detailing Life Insurance policy acquisitions and premium payments	0.25 250.00/hr	62.50

Deeproot Chapter 7

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
8/25/2022	Review and revise AR Robert Mueller account for Citibank credit cards as statements are not available. E-mail report to Drew and Randy	0.50 250.00/hr	125.00
9/18/2022	Receive CNB discovery documents. Review information. Format and print all excel spreadsheets to allow for recording QB journal entries	0.75 250.00/hr	187.50
9/20/2022	Enter all Community National Bank IRA distribution checks for 2020 and January 2021	4.25 250.00/hr	1,062.50
9/21/2022	Complete posting of dividend expenses from CNB spreadsheets. Copy all QB files and deliver to Pulman office with my 2015 QB software. Discuss various case issues with Randy, Drew, and Anna	2.50 250.00/hr	625.00
9/24/2022	Receive and post final open payments for Deeproot funds. Work on combined payment spreadsheet	2.00 250.00/hr	500.00
9/25/2022	Complete preparation of Deeproot receipts and disbursements by investor	4.75 250.00/hr	1,187.50
9/26/2022	Complete investor payment spreadsheet and e-mail to Randy, Drew and Anna	3.25 250.00/hr	812.50
9/30/2022	Update consolidated balance sheet for 2021 to reflect impact of newly identified payments. Prepare consolidated schedule of professional fees and finders fees, E-mail to Randy, Drew, and Anna	5.00 250.00/hr	1,250.00
	For professional services rendered	<u>110.25</u>	<u>\$23,625.00</u>
	Balance due		<u><u>\$23,625.00</u></u>